



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS,
TRIBAL AND PUBLIC
AFFAIRS

August 1, 2013

Matthew Sprau, Directorate of Public Works
Attention: IMFW-PWE (Sprau)
1060 Gaffney Road #4500
Fort Wainwright, Alaska 99703-4500

Re: EPA comments on the Draft Environmental Impact Statement for Disposition of Hangars 2 and 3, Fort Wainwright, Alaska, EPA Project # 11-4133-DOD.

Dear Mr. Sprau:

Thank you for the opportunity to review the Draft Environmental Impact Statement (EIS) for the Disposition of Hangars 2 and 3, Fort Wainwright, Alaska (CEQ #20130173). We have reviewed the EIS in accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act. Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions as well as the adequacy of the EIS in meeting procedural and public disclosure requirements of NEPA.

We commend the U.S. Army Garrison Fort Wainwright, Alaska (USAG-FWA) for an extremely clear, thorough and user-friendly document. We especially appreciate the inclusion of color maps and diagrams, tabs, an index, and useful appendices in the hard copy. We also recognize the notable effort by USAG-FWA to consult with potentially affected and interested federally-recognized tribes. Finally, we believe the EIS considered a wide range of alternatives and appropriately screened out those alternatives not meeting rational criteria to result in the USAG-FWA preferred alternative (Alternative 1).

We have given the EIS a rating of EC-1 (Environmental Concerns-Adequate Information). A description of our rating system is enclosed. Based on review, and as identified in our scoping comments, our primary concern continues to be the management of known CERCLA sites (FTWW-018, CC-FTWW-103, and FTWW-348) as well as yet-to-be-discovered contamination in the project area. The EIS clearly identifies the likelihood of additional contamination surrounding and beneath the hangar project area, as well as beneath other structures being demolished in the project area. We strongly encourage USAG-FWA to work closely with our Federal Facilities program (Deb Yamamoto, EPA Region 10 Federal Facilities Site Cleanup Manager, 206-553-7216 or yamamoto.deb@epa.gov) as results of sampling become available and if any changes to institutional controls or the CERCLA Record of Decision are contemplated.

Again, we appreciate the opportunity to offer comments on the Draft EIS and look forward to working with you on the final EIS to address the CERCLA-related issues we have identified. Please contact me at

(206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or you may contact Jennifer Curtis of my staff in Anchorage at (907) 271-6324 or curtis.jennifer@epa.gov with any questions you have regarding our comments.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediments Management Unit

Enclosure

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.